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Cynghorydd Annibynnol ar Safonau Gweinidogol  
Independent Adviser on Ministerial Standards



Llywodraeth Cymru  
Welsh Government

Jeremy Miles MS  
Former Cabinet Secretary for Health and Social Care

BY EMAIL:

13 May 2026

Dear Mr Miles

Thank you for seeking my advice under the Welsh Government's Business Appointment Rules for Former Ministers (the "Rules") in relation to your proposed role with Pride Cymru.

The Rules exist to protect the integrity of government and to safeguard public confidence in government by ensuring that former Ministers do not, and are not perceived to, derive improper advantage or profit from their time in office, or confer such advantage on others. In considering your application, my focus is therefore on whether any risks arise from your previous role and, if so, how these can be appropriately managed.

The material information and my consideration are set out in the Annex. I am content that the appointment as Patron of Pride Cymru may proceed subject to the appropriate conditions set out below, recognising that it is your responsibility to ensure that these are demonstrably applied in practice:

**Standard Conditions:**

1. **Privileged information condition** - You may draw on skills and experience gained from your time in office however you must not, at any time, draw on any privileged information gained in office. This is an ongoing duty irrespective of the time elapsed since you left office.
2. **Lobbying condition** - Any contact with the Welsh Government, directly or indirectly, must only be where it could not reasonably be perceived as lobbying. This applies for two years after leaving office.
3. **Contracts and bids condition** - You must not work or advise on any bids to secure governmental funding or contracts. This applies for two years after leaving office.

*Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.*

*We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.*

I would also ask you to note the following:

- This advice does not constitute an endorsement of your engagement as patron of Pride Cymru. It is limited to the application of the Rules and the management of any risks arising from your former ministerial role.
- This advice relates solely to your previous roles in government. It does not extend to, or replace, any rules administered by other bodies, including the Senedd Commission in respect of your previous role as a Member. It is your personal responsibility to ensure that you understand and comply with any other applicable rules and regulatory requirements alongside this advice.
- In this context, “privileged information” means information to which you had access by virtue of your various ministerial roles, and which is not publicly available. You may also continue to be bound by other confidentiality obligations, including those under the Official Secrets Act, the Ministerial Code, or similar requirements.
- As set out in the Rules, the lobbying restriction prevents former Ministers from engaging in communication with government (including Ministers, civil servants, special advisers, and other public office holders), wherever that communication takes place, with a view to influencing a government decision, policy, or the award of a contract or grant in relation to their own interests or those of the organisation with which they are associated.

In line with the Rules, I would ask that you notify my secretariat when the appointment is taken up or publicly announced, at which stage this advice will be published. You should also let us know if there are any plans to materially change the nature of the role, as this may require further advice or a new application.

Yours sincerely,

**Dr Melissa McCullough**

Independent Adviser on Ministerial Standards / Cynghorydd Annibynnol ar Safonau Gweinidogol

## **Annex – Material information and consideration of the risks**

### **The role**

You have made a Level 1 application to take up the role of Patron of Pride Cymru. The role is a non-paid, part-time ambassadorial role requiring visible presence at Prime Cymru events across Wales.

Pride Cymru is a volunteer-led charity that works to promote the elimination of discrimination be it on the grounds of sexual orientation, gender, race, religion or ability. Pride Cymru receives funding from a range of organisations, including the Welsh Government.

### **Assessment**

The role is unpaid and aligns with your established public profile and recognised contributions. As such, there is a very low risk of it being perceived as a reward for past favours.

A potential issue arises in relation to perceived propriety given the previous funding of Pride Cymru by the Welsh Government. However, the evidence indicates that, in your role as Cabinet Secretary for Health and Social Care, you took a decision to continue the HIV Plan arrangements that were already in place upon your appointment. Pride Cymru was not a beneficiary of this funding decision. It is also relevant that you agreed to a full tender exercise, which ultimately resulted in a new contract being awarded to a stand-alone charity.

### **My consideration of the risks**

Having considered the factors set out above, together with the information you have provided, I have identified no reasonable basis for public concern in relation to your taking up the part-time unpaid role of Patron of Pride Cymru. I therefore see no grounds on which to advise against your acceptance of the role. Any risks that do arise can be appropriately managed through the standard conditions.

Dr Melissa McCullough  
13 May 2026